ORGANISATION, MANAGEMENT AND CONTROL MODEL
LEGISLATIVE DECREE 231/01 AND RELATED REGULATIONS OF
INTEXO SOCIETÀ BENEFIT S.R.L. A SOCIO UNICO

Code of Ethics

Edition No. 7

Subject: dissemination of the Code of Ethics *pursuant to* Legislative Decree no. 231/2001 and related regulations

Legislative Decree no. 231 of 8 June 2001 introduced the administrative liability of entities with or without legal personality in the presence of crimes committed in their interest by persons who hold representation, administration or management functions of the entity and by the subjects subject to their management and supervision.

The liability of the entity is added to that of natural persons.

The penalties provided for against the entity are particularly severe and can have a devastating impact on both the business and the image of the entity itself.

The legislation provides that the entity is exempt from the aforementioned liability if the management body demonstrates that it has adopted and effectively implemented organizational and management models to prevent the commission of crimes.

The Company has carried out a project to prepare and implement the *"Model"* suitable for the reality of our Company. The main elements of the Model are: the Summary Document, the Code of Ethics, the Disciplinary System, the Complaints System, the Communication System, the activities of the Supervisory Body and a series of Protocols concerning the activities at greatest risk of crime.

The Board of Directors approved the Model and its constituent elements required by the law and the guidelines of the main trade associations. Among these constituent elements of the Model, particular attention must be paid to the *"Code of Ethics"*.

The Code of Ethics is an official document of the Company and as such was desired and approved by the company's top management. It contains the set of principles to which the Company intends to conform its activity and that of the subjects operating on its behalf and, therefore, has the main purpose of recommending, promoting or prohibiting certain behaviors that the Company requires not to be adopted beyond and regardless of what is provided for by the law.

In particular, the Company, by means of the rules contained in the Code of Ethics, intends to obtain a reasonable prevention of crimes against the Public Administration (and its assets) and corporate crimes specifically indicated by the enabling law, regulating all activities considered at risk, especially if they do not have a rule under technical and/or deontological profit.

From this point of view, it is understandable that the Company, in order to give perceptive force to the provisions contained in the Code, has adopted a disciplinary system, in line with the CCNL and the Workers' Statute, aimed at sanctioning conduct that is detrimental to the principles and rules of conduct contained in the Code.

In any case, it is important to anticipate that the necessary training will be given on each of these aspects concerning the Code of Ethics and the related disciplinary system. Nevertheless, given the need and importance of making effective the knowledge and application of the rules and principles contained in the Code and taking note that the same is already formally in force in our organization, we invite you to become aware of the contents and to implement the necessary actions within your competence in order to ensure greater knowledge and dissemination to the respective (functions) of the copy attached to this document.

Rome, 21/11/2024

The Chairman of the Board of Directors

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1. Introduction

This Code of Ethics (hereinafter also the *"Code")* expresses shared ethical principles and values, outlines the ethical and behavioural commitments and responsibilities in the conduct of business and corporate activities undertaken by the employees/collaborators of **Intexo Società Benefit S.r.l.** (hereinafter also *"Intexo SB", "entity"* or *"Company").*

The Code confers legal relevance and mandatory effectiveness to the ethical principles and standards of conduct contemplated therein, also and above all for the purpose of preventing crimes related to the activity of the entity, characterizing the company policy of safeguarding and combating the commission, even indirectly, of this type of offence.

The provisions contained in the Code bind the conduct of anyone who works within it, on behalf of and/or on behalf of it.

Violation of the Code compromises the relationship of trust between the Company and the offender and involves the subjection of the accused to disciplinary proceedings in accordance with the principles of adequacy and proportion of sanctions.

Compliance with the Code of Ethics does not justify the violation of other national and international regulatory provisions as well as consolidated internal practices and procedures.

Any conflicts of interpretation between the principles and contents of the Company's procedures and the principles and contents of the Code shall be deemed to have been resolved in favour of the latter.

In any case, if there are questions to ask or clarifications for any ambiguity found, it is possible to contact one of the following figures:

- **Superior**: is the one to whom the subordinate reports and who has greater competence in the subordinate's area of responsibility.

If the report or any problems highlighted concern the direct Superior, it is possible to contact:

- **the Supervisory Body *pursuant to* Legislative Decree 231/01:** this is the body from which clarifications can be requested regarding the Code of Ethics or the 231 Organisational Model;
- **the Human Resources, Quality & Compliance Manager:** this is the function specialized in personnel management.

Each employee or collaborator must receive a copy of this Code of Ethics and any related updates by means of the *"Delivery receipt" certificate.*

The Code of Ethics therefore consists of:

1. the general principles on relations with Stakeholders, which define the reference values in the activities of Intexo SB;
2. the criteria of conduct towards each class of Stakeholders, which specifically provide the guidelines and rules to which the Company's collaborators are required to comply in order to comply with the general principles and to prevent the risk of unethical behaviour;

3. the implementation mechanisms, which describe the control system for compliance with the Code of Ethics and for its continuous improvement.

1.1. THE MISSION OF INTEXO SB

The mission of Intexo SB S.r.l. a socio unico is to pursue excellence in regulatory consultancy and assistance in *market access* as well as in the promotion, management and provision of a variety of services such as, but not limited to, marketing, external communication, business strategy, development of advertising plans and programs, organization and planning of events and exhibitions. All this by enhancing skills and technological innovation in growth initiatives to create value for its members, customer satisfaction and professional growth of employees.

1.2. THE RECIPIENTS OF THE CODE OF ETHICS

This Code of Ethics is an integral part of the *"Organization, Management and Control Model"* provided for by Article 6 of Legislative Decree 231/2001. The Company's activities must therefore comply with the principles expressed therein.

This Code of Ethics applies to all the Company's activities. The principles and provisions of the Code of Ethics apply without exception to the employees of Intexo SB and to all persons (e.g. members of the Board of Directors, external collaborators, etc.) who, directly or indirectly, permanently or temporarily, establish, for any reason, relationships and collaborative relationships, cooperating in the performance of its activities and contributing to the achievement of its objectives. All the aforementioned subjects are hereinafter collectively referred to as *"recipients"*.

The Company undertakes to disseminate the Code of Ethics to the recipients through specific communication activities.

In order to facilitate the full application of the Code, the Company, within the scope of the responsibilities provided for by legislative provisions, will also take steps to:

1. constantly monitor the application of the Code of Ethics by the interested parties, also through the acceptance of any reports;
2. report any violations of the Code;
3. express binding opinions on any revision of the most relevant company policies and procedures, in order to ensure their consistency with the Code of Ethics;
4. provide, where necessary, for the periodic revision of the Code;
5. propose or apply appropriate sanctioning measures in the event of violation.

Each Manager:

1. represents with his behavior an example for his collaborators;
2. promotes compliance with the rules of the Code by the recipients;
3. works to ensure that the recipients understand that compliance with the rules of the Code is an essential part of the quality of the performance of work and of one's own activity;
4. take immediate corrective action when required by the situation;
5. it shall endeavour to prevent, within the limits of its powers and powers, possible conduct that

does not comply with current legislation, this Code or internal regulations.

The implementation of the Code of Ethics is entrusted to the Chairman of the Board of Directors, who avails himself, for this purpose, of the control body established pursuant to Legislative Decree 231/2001 and related regulations called the Supervisory Body (hereinafter also *referred to as the "SB").*

1.2.1. Obligations of recipients

All actions, operations and negotiations and, in general, the conduct carried out by the recipients of this Code in the performance of their work activities must be based on the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect, as subsequently explained.

All activities must be carried out with commitment and professional rigor. Each recipient must provide professional contributions appropriate to the responsibilities assigned and must act in such a way as to protect the prestige and image of the Company for which he works.

The recipients of the Code of Ethics are required to comply with the provisions and principles contained therein even if they are expressed as criteria of corporate conduct and not as precepts addressed directly to the recipients themselves.

1.2.2. Contractual value of the Code of Ethics

Knowledge of and compliance with the provisions of the Code are an indispensable requirement for the establishment and maintenance of collaborative relationships with third parties, to whom the Company undertakes to disseminate all related information, in a context of total transparency.

Compliance with the rules and provisions contained in the Code of Ethics is an integral and essential part of the contractual obligations deriving from subordinate employment relationships, for employees, and from contractual regulations, for non-subordinate collaborators. Violation of the aforementioned rules will constitute a breach of the obligations deriving from the employment or collaboration relationship, with any legal or contractual consequences.

1.2.3. Validity of the Code of Ethics

The Code of Ethics is valid both in Italy and abroad, even taking into account cultural, social or work diversity, as well as the economic and regulatory treatment of collaborators are lower than those normally applied in Italy, Intexo SB S.r.l. a socio unico undertakes to ensure a continuous and appreciable improvement of the levels practiced on site in a manner consistent with the principles of this Code.

The Code of Ethics applies to all entities with which the Company operates and is consequently binding for the conduct of all its collaborators. Therefore, the entity requires the companies with which it operates and the main suppliers to conduct themselves in line with the general principles of this Code.

1.3. AN ETHICAL AND COOPERATIVE APPROACH TO STAKEHOLDERS

Intexo SB S.r.l. a socio unico aspires to maintain and develop a relationship of trust, loyalty, fairness, transparency, collaboration and mutual respect with its Stakeholders, i.e. with those categories of individuals, groups or institutions whose contribution is required to achieve the mission of the entity or who in any case have an interest at stake in its pursuit.

Stakeholders are those who make investments related to the activities of Intexo SB S.r.l. a socio unico, first and foremost the shareholders and, therefore, the collaborators, customers, suppliers and business partners.

In the conduct of business, unethical behaviour compromises the relationship of trust between Intexo SB and its Stakeholders. The behaviors of anyone, individual or organization, who tries to appropriate the benefits of the collaboration of others by exploiting positions of strength or violating the rules are unethical, and encourage the assumption of hostile attitudes towards the company.

1.4. THE VALUE OF REPUTATION

Good reputation is an essential intangible asset.

A good reputation abroad favors the investments of members, customer loyalty, the attraction of the best human resources, the collaboration of suppliers, reliability towards creditors. Internally, it allows decisions to be taken and implemented without friction and to organize work without bureaucratic controls and excessive exercises of authority.

Since the Code of Ethics clarifies the particular duties of Intexo SB towards Stakeholders, its effective observance is proposed as a term of comparison on the basis of which to judge the reputation of the Company.

1.5. THE VALUE OF RECIPROCITY

This Code is based on an ideal of cooperation with a view to the mutual benefit of the parties involved, respecting the role of each one. The company therefore requires that each Stakeholder act towards it according to principles and rules inspired by a similar idea of ethical conduct.

2. General ethical principles

Intexo SB S.r.l. a socio unico considers the performance of services by its employees and collaborators according to diligence, competence, professionalism and efficiency to be of fundamental importance, also in order to provide customers with high quality services. The institution considers impartiality of treatment a fundamental value in the context of every relationship, both internal and external, and considers the individual, his values and rights, especially human rights, values to be protected.

The recipients of this Code of Ethics, as well as all those who act in the name and on behalf of the entity, must comply, within their competence, with the following guiding principles:

2.1. IMPARTIALITY

In decisions that affect relations with its Stakeholders (the choice of customers to serve, relations with shareholders, personnel management or work organization, selection and management of suppliers, relations with the surrounding community and the institutions that represent it), Intexo SB S.r.l. a socio unico avoids any discrimination based on age, gender difference, sexuality, state of health, race, nationality, political opinions and religious beliefs of its interlocutors by interfacing with them with honesty, fairness, impartiality and without prejudice.

2.2. HONESTY

As part of their professional activity, the Company's collaborators are required to diligently comply with the laws in force, the Code of Ethics and internal regulations. Under no circumstances can the pursuit of the interest of the entity justify dishonest conduct.

2.3. CORRECTNESS

In the conduct of any activity, situations must always be avoided where the parties involved in the transactions are, or can only appear, in conflict of interest. This means both the case in which an employee pursues an interest other than the business mission and the balancing of the interests of the Stakeholders or *"personally" benefits from* business or work opportunities, and the case in which the representatives of customers or suppliers, or of public institutions, act in contrast with the fiduciary duties linked to their position.

In all conduct of social life, all recipients of this Code must behave in a manner that brings honour to their profession. In the context of working hours and workplaces, everyone's behavior must be inspired by fairness, respect and a spirit of collaboration.

2.4. CONFIDENTIALITY

Intexo SB S.r.l. a socio unico ensures the confidentiality of data and information in its possession regarding the Entity, its know-how, personnel, customers and suppliers and refrains from seeking confidential data, except in the case of express and conscious authorization and compliance with the legal regulations in force. In addition, the employees/collaborators of Intexo SB are required not to use confidential information for purposes unrelated to the exercise of their business. All this also in full compliance with the contents of the European Regulation 2016/679 on privacy.

All recipients are required to maintain the strictest confidentiality with regard to facts of which they become aware in the course of their work, with reference to both customers and the Company. Official secrecy also includes the internal organization of the Company, internal regulations, projects, operations, also with reference to facts and situations that are no longer current.

2.5. RELATIONS WITH MEMBERS

The member is not only a source of funding but a subject with opinions and moral preferences of various kinds. In order to guide investment decisions and corporate resolutions, it therefore needs all the relevant information available.

The Company creates the conditions for the participation of members in the decisions within their

competence to be informed by promoting equality of information.

2.6. VALUATION OF CORPORATE INVESTMENT

Intexo SB strives to ensure that economic/financial performance is such as to safeguard and increase the value of the company in order to adequately remunerate the risk that the shareholders assume with the investment of their capital.

2.7. VALUE OF HR

The employees/collaborators of the institution are an indispensable factor for the success of the Company. For this reason, the latter protects and promotes the value of human resources in order to improve and increase the assets and competitiveness of the skills possessed by each collaborator.

2.8. EQUITY OF AUTHORITY

In the signing and management of contractual relationships that imply the establishment of hierarchical relationships, especially with collaborators, Intexo SB S.r.l. a socio unico undertakes to ensure that the authority is exercised with fairness and correctness, avoiding any abuse. In particular, the Company guarantees that authority is not transformed into an exercise of power detrimental to the dignity and autonomy of the employee/collaborator and that the choices of work organization safeguard the value of the same.

2.9. INTEGRITY OF THE PERSON

The Company rejects in any way any conduct that may favor or facilitate the performance of practices proper to any culture or religion that are in contrast with the rules of public order recognized by the State and that affect the physical integrity of people for purposes unrelated to the processing or, in any case, considered unlawful by the laws in force.

The entity guarantees the physical and moral integrity of its employees/collaborators, working conditions that respect individual dignity and safe and healthy working environments with particular reference to and in full compliance with the contents of Law no. 199 of 29 October 2016 containing the *"Provisions on combating the phenomena of undeclared work, exploitation of labor in agriculture and wage realignment in the agricultural sector",* contents universally applicable also to realities other than agricultural ones.

Requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behaviors that are harmful to the moral and personal beliefs and preferences of each person, are not tolerated.

Intexo SB prohibits the promotion, direction, organization, financing and transport of foreigners in the territory of the State, or the performance of other acts aimed at illegally procuring their entry into the territory of the State, or of another State of which the person is not a citizen or does not have a permanent residence permit, in the cases provided for by the law in force, nor to encourage the illegal stay of the foreigner in the territory of the State in order to take an unfair profit from the condition of illegality of the aforementioned.

In addition, the entity censures any type of activity or behavior, even at an abstract and potential level, configured in art. 25-terdecies of Legislative Decree 231/01 *"Racism and xenophobia"*.

2.10. TRANSPARENCY AND COMPLETENESS OF INFORMATION

The information is processed by Intexo SB S.r.l. a socio unico in compliance with the confidentiality and privacy legislation in force of the data subjects. In particular, the Company:

1. defines an organization for the processing of information that ensures the correct separation of roles and responsibilities;
2. where appropriate, classify the information by levels of increasing criticality and take appropriate countermeasures at each stage of processing;
3. in specific circumstances, it subjects third parties who intervene in the processing of information to the signing of confidentiality agreements.

The collaborators/employees of Intexo SB S.r.l. a socio unico are required to communicate complete, truthful, clear, transparent, comprehensible and accurate information so that, in setting up relations with the Company, the Stakeholders are able to make autonomous decisions that are aware of the interests involved, the alternatives and the relevant consequences.

The decision-making, licensing and performance processes for all activities must be properly recorded and subject to verification.

Again with reference to ethical values, all recipients of this Code must undertake, in criminal proceedings, not to:

1. oblige, induce or condition, in any form and in any manner, in the misunderstood interest of the entity, the free will of the recipients to respond to the judicial authority or to make use of the right not to respond;
2. accept/offer money or any other benefit, including through third parties, to make/obtain untruthful statements

and pursuant to Article 377 of the Criminal Code, (Article 25-novies.1 *of* Legislative Decree 231/01 and related regulations).

2.11. CONTRACT MANAGEMENT

In formulating any contracts, the Company takes care to specify to the policyholder the conduct to be adopted in all the circumstances envisaged, in a clear and understandable manner.

Contracts and work assignments must be carried out in accordance with what is consciously established by the parties. Intexo SB S.r.l. a socio unico undertakes not to exploit conditions of ignorance or incapacity of its counterparties.

It is to be avoided that in existing relationships, anyone operating in the name and on behalf of the Company tries to take advantage of contractual gaps, or unforeseen events, to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the interlocutor has found himself.

2.12. QUALITY OF SERVICES

Intexo SB orients its business towards the satisfaction and protection of its customers by listening to requests that can promote an improvement in the quality of services. For this reason, the Company directs its research, development and marketing activities to high standards of quality of its services.

2.13. FAIR COMPETITION

The Company undertakes to comply with the rules of fair competition, avoiding the risk of committing anti-competitive, unfair or fraudulent conduct towards competitors and refraining from collusive, predatory and abusive behaviour.

Since the 1957 Treaty of Rome that established the European Union, free competition has been a fundamental tool for the creation and implementation of the European economic and political model. For this reason, Intexo SB S.r.l. a socio unico, through this Code of Ethics, fully complies with EU competition law and the corresponding national competition laws.

Unfair and anti-competitive practices are not compatible with the Articles of Association, the laws, the regulations, the values that inspire the entity and in contrast with the *Corporate Reputation* built and preserved over time.

All information relating to customers and suppliers, business transactions, prices, contract conditions or potential competitors is collected using only legal means.

The implementation of defamation practices against one's direct competitor is prohibited.

Except in cases where the information is in the public domain, it is forbidden to talk about:

- customers, including agreements established;
- suppliers, including agreements established;
- financial information, including the cost incurred in purchasing goods and services, profit or any profit margins;
- any public tenders;
- production capacity;
- prices or methods used to define them on the market.

The contacts established with potential competitors must be planned and provide for the details of the motivations as well as be evaluated in advance on a case-by-case basis with the assistance of the External Lawyer.

Conduct of giving money or other benefits, directly or indirectly with the help of an intermediary person/entity, aimed at altering the procedures for selecting the contractor by another company in favor of Intexo SB S.r.l. a socio unico, is prohibited.

2.14. ENVIRONMENTAL PROTECTION

The environment is the primary asset that Intexo SB S.r.l. a socio unico undertakes to safeguard the rights of future generations, committing itself at every stage of its actions to apply criteria of caution and a preventive approach towards the environment and its biodiversity.

Intexo SB often takes into consideration the social and environmental impact of its activities as it is considered an element that strengthens the success of the institution.

The Company contributes to the dissemination and awareness of environmental protection issues, managing the activities entrusted to it in an eco-compatible way, in compliance with current national and European legislation, both at its headquarters and at any site where it carries out its business activity.

With a view to promoting high environmental standards, the body has introduced eco-sustainable behaviors oriented, by way of example but not limited to:

1. the reduction in the use of plastic materials by making specific recommendations in this regard, especially in refreshment points;
2. energy saving, for example, by urging the lights to be turned off and taking advantage of natural light, encouraging the practice of automatically turning off the PC after a certain time of non-use;
3. to the contraction in the use of paper by limiting it to the essentials;
4. to a punctual management of waste through separate collection. In this sense, it is absolutely forbidden to treat waste disposal in violation of the law, company procedures and the Model's ethical-organisational behavioural protocols;
5. the periodic cleaning of air conditioner filters to make the air cleaner;
6. to use office supplies with recycled materials and/or purchased from a list of preferred suppliers for the sake of the environment;
7. the encouragement of the use of public transport for the journeys required by work in order to prevent pollution and protect the environment.

All employees/collaborators are responsible for coordinating and controlling the implementation of legal recommendations and requirements on the environment, pollution and waste disposal, etc.

All recipients of the Code of Ethics are required to contribute to the process of protecting and safeguarding the environment. In particular, the parties involved in the operating processes are required to pay the utmost attention to avoiding any illegal dumping and emission of harmful materials or any special waste and to treat the waste in accordance with the specific requirements, in compliance with the law and company procedures.

Pursuant to and for the purposes of Law 68/2015, the recipients of this Code are required to:

1. not cause significant and measurable impairment or deterioration of water, air, large or significant portions of the soil or subsoil, an ecosystem, biodiversity, including agricultural biodiversity, flora and fauna (environmental pollution - Article 452-bis of the Criminal Code);
2. not irreversibly alter the balance of an ecosystem even when its elimination is particularly burdensome and can only be achieved by exceptional measures. In addition, not to offend public safety due to the relevance of the fact for the extent of the compromise or its harmful effects or for the number of people offended or exposed to danger (environmental disaster - Article 452-quarter of the Criminal Code);
3. not to transfer, purchase, receive, transport, import, export, procure for others, possess, transfer,

illegally abandon or illegitimately dispose of highly radioactive material (trafficking and abandonment of radioactive material - Article 452-sexies of the Criminal Code).

The Company promotes the participation of employees/collaborators in the process of risk prevention, specific training, environmental protection with reference to the various regulatory updates on the subject, as well as elaborates and communicates the aforementioned specific recommendations to the interested parties.

An assessment of the environmental impact of company activities is periodically carried out through a Self Risk Audit that allows us to identify any improvement actions on the subject.

2.15. ANTI-CORRUPTION POLICY

Intexo SB S.r.l. a socio unico establishes, through this Code of Ethics, that in no professional case does it resort to corrupt practices that procure interest or advantage, for itself or for third parties.

Corruption, in the legal field and in a generic sense, is defined as *"the conduct of a public official who receives, for himself or for others, money or other benefits that are not due to him".*

Please note that, if there are doubts, questions to be asked or clarifications for any ambiguity found, before taking any action, it is possible to represent one's uncertainties to the direct superior or, in more significant cases, directly to the Supervisory Body.

2.15.1. Rules of conduct in relations with the Public Administration

For the purposes of this Code, Public Administration must be understood as "*any public body, independent administrative agency, person, natural or legal, which, regardless of its legal nature, acts as a public official or as a person in charge of a public service".*

The assumption of commitments towards Public Institutions is reserved exclusively to the corporate functions in charge and authorized, in compliance with the strictest compliance with the provisions of the law, EU, national and regional regulations as well as applicable regulations and must not in any way compromise the integrity and reputation of the Company.

The Board of Directors has approved a specific *"List of top management figures authorised and entitled to maintain relations with the Public Administration".*

Any direct activity, or even through an intermediary, aimed at influencing the independence of judgment or ensuring any advantage to the Entity is prohibited.

Recipients of this Code must operate in accordance with the law and ethics.

Payments or remuneration, in any form, offered, promised or made directly or through a natural or legal person to induce, facilitate or remunerate a decision, the performance of an official act or contrary to the official duties of the Public Administration, carried out in the interest of the intermediary or to its advantage, are strictly prohibited.

The provisions referred to in the previous paragraphs also apply to natural or legal persons acting for or on behalf of the Public Administration or in the event of unlawful pressure.

If the recipients of this Code receive explicit or implicit requests for benefits of any kind from the Public Administration or from natural or legal persons acting for or on behalf of the Public Administration itself, they must immediately suspend all relations and inform their direct manager in writing.

The same subjects must not circumvent the requirements indicated in the previous paragraphs by resorting to different forms of aid or contributions which, under the guise of sponsorships, assignments, consultancy, advertising, etc., have the same purposes prohibited by this paragraph.

The provisions indicated in the preceding paragraphs do not apply to ordinary and reasonable entertainment expenses or gifts of modest value that correspond to the normal customs in relations between intermediaries and the subjects indicated in this article and provided that they do not violate the provisions of the law.

It is mandatory to inform the Supervisory Body of the initiation of the most significant operational contacts of the entity with the Public Administration or with natural or legal persons acting for or on behalf of the latter, as well as of the continuation and conclusion of the same activities.

In addition, it is strictly forbidden to:

1. give or promise, even through an intermediary, money or other benefits not due to top management figures of other companies or private entities, to procure an advantage for Intexo SB, so that they perform or omit an act in violation of their obligations even if the corrupt offer is not accepted and the corrupt solicitation is not accepted;
2. manage any requests for subsidies and public funding in an untruthful, incomplete, outdated manner and prepared by non-competent Functions in relation to the data transmitted to the public body;
3. transmit to the public body the documentation required for the purposes of any financing not adequately accompanied by a *"Certificate of truthfulness"* drawn up by the Contact Person functionally responsible for the preparation of the specific deed;
4. to mislead the State or a Public Body, with artifices or deceptions, to procure the Company an unjust profit to the detriment of others. Unfair profit can be direct or indirect and also include contributions, loans, other disbursements however denominated, granted by the State, by a Public Body or by the European Communities. Pursuant to this Code, "artifice or deception" means "*any simulation or dissimulation put in place to mislead, including false statements, failure to disclose circumstances that one is obliged to report, simple silence maliciously maintained on certain circumstances that one has the duty to make known, etc.".*
5. use or submit false declarations or documents or attesting to untrue things, or omit due information, to obtain contributions, financing, or other disbursements, however denominated, granted by the State, a Public Body or the European Communities, for the benefit or in the interest of the entity;
6. not to allocate contributions, financing, or other disbursements, however denominated, granted by the State, by a Public Body or by the European Communities, to the execution of the works or to the performance of pre-established activities of public interest, to procure directly or

indirectly an advantage or utility for the entity;

7. alter in any way the operation of a computer or telematic system or intervene illegally in any way on data, information or programs contained in a computer or telematic system pertaining to it to the detriment of the State or a Public Body, to directly or indirectly procure an advantage or utility to the entity. For the purposes of this Code of Conduct, "information system" means a "*set of equipment intended to perform any function useful to people, through the use (even partial) of information technologies*".

If the Company uses a consultant or a third party to represent it in relations with the Public Administration, the same directives apply to such persons and their personnel as to the Company's employees. Furthermore, in the choice of such consultants, the Company will privilege criteria of professionalism, fairness and competence, excluding anyone who has organic or dependent relationships with the Public Administration, even indirectly through an intermediary, or close family ties.

It is mandatory to comply with the contents of the Code of Ethics for public employees, referred to in the Amendment of the Monti Government - Presidential Decree no. 62 of 16 April 2013 which extends, as far as compatible, the obligations of conduct provided for by the code to all collaborators or consultants who with any type of contract or assignment and in any capacity work for the Public Administration, to the holders of bodies and positions in the offices of direct collaboration of the Public Authorities as well as to collaborators in any capacity of companies supplying goods or services and carrying out works in favor of the Public Administration. This is done with the insertion, in private contracts by the Public Administration, of specific clauses for the termination or forfeiture of the relationship in the event of violation of the obligations deriving from the aforementioned Code.

It should be noted that Intexo SB prohibits the assignment of a consultancy assignment to a former Public Official, their family members, or to persons with whom such persons are known to have close ties in contrast with the content of art. 53 paragraph 16-ter of Legislative Decree 165/2001 (Consolidated Law on Public Employees) inserted in Law 190/12, an integral part of Decree 231/01 et seq. These are, in particular, former public employees, or members of the top political bodies of the Public Administrations, who in the previous three years of service have exercised authorization or negotiation powers on behalf of the P.P.A.A. having as addressee the same Intexo SB (so-called prohibition of *pantouflage or revolving doors*).

In the event that, within specific contracts, international anti-corruption regulations and documentation and/or in force in a specific country are referred to, the employee/collaborator is required to pay the utmost attention to reading these regulations and scrupulously observing their contents, contacting their direct superior for any doubts or further information.

In any case, it should be noted that the Organisational Ethics Protocol no. 4/2008 *"General principles relating to the management of relations with the Public Administration"* lists the prevention and behaviour tools to be activated in order to ensure that all relations with the Public Administration are carried out in a clear, correct, transparent, traceable and ex-post verifiable manner.

2.15.2. Gifts, Giveaways & Benefits

No form of gift is allowed, even to other companies with which Intexo SB S.r.l. a socio unico has contractual relationships, which can also only be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any activity related to the entity.

In particular, any form of gift to Italian and foreign public officials, or to their family members, which may influence the independence of judgment or induce to ensure any advantage, is prohibited, except in cases where there has been a prior special approval.

Therefore, the addressees of this Code must comply with the provisions of art. 25 of Legislative Decree 231/01, i.e. they must not:

1. abuse their position or powers to force or induce persons who have benefited or may benefit from decisions or activities relating to the office performed to unduly give or promise - to them or to a third party, or to them or to a third party on behalf of the entity - money, gifts or other benefits;
2. receive or accept the promise of money, gifts or other benefits on their own behalf, on behalf of a third party or on behalf of the entity, to perform an act contrary to the duties of office or for having performed an act contrary to the duties of office, from persons who have benefited or may benefit from decisions or activities relating to the office performed, except in the case of gifts of modest value;
3. receive or accept the promise of money, gifts or other benefits on one's own behalf, on behalf of a third party or on behalf of the entity, to omit or delay an official act;
4. engage in conduct to favor or harm a party in a civil, criminal or administrative proceeding, and bring a direct or indirect advantage to the entity.

These behaviors, which do not allow exceptions even in those countries where offering valuable gifts to business partners is customary, concerns both gifts promised or offered and those received; it should be noted that a gift means any type of benefit (free participation in conferences, promise of a job offer, etc.). In any case , the Company refrains from practices that are not permitted by law.

Any gifts offered – except those of modest value – must be documented in an adequate manner to allow checks and authorizations by the department manager, who will notify the Company's department in charge in advance.

The employees/collaborators of Intexo SB S.r.l. a socio unico who receive gifts or benefits not provided for by the permitted cases, are required, in accordance with the established procedures, to notify the function of the company that assesses the appropriateness and provides for the notification to the sender of the Company's policy on the matter.

If an employee or collaborator is suspicious of potential bribery or bribery against a public official, even if only at the level of an attempt (where *"public official"* means *"any person employed by, or acting on behalf of, or who holds a role or responsibility in the performance of a public service for a government, public body, administration or authority, as well as any independent public body, political party, body or administrative authority and its related offices"*. The definition of a public official also includes health professionals who carry out their activities for public bodies or who carry

out consultancy functions for public bodies, whether paid or not), of a partner of the Company or of one of its representatives, is required to promptly inform their direct Superior or the Supervisory Body.

2.15.3. Rules of conduct in accounting and social activities

Intexo SB S.r.l. a socio unico observes the rules of correct, complete and transparent accounting, according to the criteria indicated by the relevant legislative provisions, including criminal, civil and tax provisions as well as by the current Accounting Standards.

In accounting for the facts relating to the management of the Company, employees and collaborators are required to scrupulously comply with current legislation , ethical and organisational protocols and internal procedures so that each transaction is not only correctly recorded, but also authorised, verifiable and legitimate.

Employees and collaborators are required to act transparently towards the Supervisory Body, and to provide them with the utmost collaboration in carrying out verification and control activities.

For each operation, adequate documentation supporting the activity carried out is kept in the records in order to allow:

- easy accounting entry;
- the identification of the different levels of responsibility;
- the accurate reconstruction of the operation, also to reduce the likelihood of interpretative errors.

Each recording must reflect exactly what is reflected in the supporting documentation. It is the responsibility of each recipient to ensure that the documentation is easily traceable and ordered according to logical criteria.

Recipients who become aware of omissions, falsifications, negligence of the accounts or documentation on which the accounting records are based, are required to promptly report the facts to their Superior or, in the case of particularly significant situations, to the Supervisory Body in order to allow the activation of the verification procedures.

3. Criteria of conduct

SECTION I
CRITERIA OF CONDUCT IN RELATIONS WITH MEMBERS

3.1. CORPORATE GOVERNANCE

3.1.1 Shareholders' Meeting of Intexo SB S.r.l. a socio unico

The Shareholders' Meeting is the privileged moment for the establishment of a fruitful dialogue between Members and the Board of Directors. To this end, the regular participation of the Directors in the work of the Shareholders' Meeting is ensured.

3.1.2 Board of Directors of the Company

The Board of Directors is responsible for the functions and responsibility for strategic and organisational guidelines, as well as verifying the existence of the controls necessary to monitor the Company's performance.

In order to ensure maximum transparency and respect for confidentiality, the appointment of the members of the Board of Directors takes place after a careful assessment of their professionalism, competence and morality.

Non-executive directors

The Board of Directors may also be composed of non-executive members (as they do not have operational and/or functional managerial powers within the company), such as to ensure that their opinion can have a significant weight in the taking of Board decisions.

The non-executive directors bring their specific skills to the Board discussions, so as to facilitate an examination of the topics under discussion from different perspectives and a consequent adoption of thoughtful, informed resolutions aligned with the corporate interest.

The Chairman of the Board of Directors

The President of the Council shall:

1. to convene, in accordance with the Articles of Association, the meetings, ensuring that the members of the Board are provided with the documentation and information necessary to allow the Board to express itself in an informed manner on the matters submitted to its examination and approval, except for reasons of necessity and urgency; in particular, the Board of Directors has exhaustive information with reference to atypical, unusual or related-party transactions;
2. to coordinate the activities of the Board of Directors and to guide the conduct of the related meetings.

The President of Intexo SB S.r.l. a socio unico takes care of the management of confidential information for the external communication of documents and information concerning the Company.

3.2. EXTERNAL COMMUNICATION

The communication of Intexo SB S.r.l. a socio unico towards its Stakeholders is based on respect for the right to information and individual freedom of opinion; under no circumstances is it permitted to disseminate false or tendentious news or comments. The entity draws attention to the contents of communications which, once made public, could lead to unpleasant situations at risk, causing liability of the entity.

All communication activities comply with the laws, rules, practices of professional conduct and are carried out with clarity, transparency and timeliness, safeguarding the Company's *"trade"* secrets and know-how.

Any form of pressure or acquisition of favorable attitudes by the media is prohibited.

All press releases are available on the website, so as to allow maximum usability.

To ensure completeness and consistency of information, the Company's relations with the mass media are reserved exclusively for the functions in charge of the utmost correctness, availability and transparency, in compliance with the communication policy defined by the Company and in compliance with the regulations in force on the subject.

Employees/collaborators may not provide information of any kind to representatives of the press and mass media in general, nor have any type of contact with them aimed at disseminating company news, without the authorization of the Board of Directors.

Representatives of the Company participate in conferences, seminars and working groups and consent to publications of a technical nature related to their activities, according to the following general rules of conduct:

- participation in each conference in a selected number of collaborators;
- prior communication to the Board of Directors.

Beyond what is contained in the individual sections of this chapter number 3 of the Code of Ethics, all personnel, internal and external, are also required to scrupulously follow the rules or rules of conduct inserted, recommended or suggested within the various Ethical and Organizational Protocols, integral parts of the Model referred to in Legislative Decree 231/01 and related regulations.

SECTION II
CRITERIA OF CONDUCT IN RELATIONS WITH PERSONNEL

Intexo SB S.r.l. a socio unico recognizes a central role in the development of human resources, respect for their autonomy and the importance of their participation in the company *mission*.

3.3. PERSONNEL SELECTION AND MANAGEMENT

The assessment of personnel, both in the recruitment phase and in the processes of management, development and access to roles and assignments, is carried out on the basis of the correspondence of the candidates' profiles with those expected and the company's needs and/or on merit considerations, in compliance with equal opportunities for all interested parties and on the basis of their professional qualifications and individual abilities of each.

It is absolutely forbidden to use child labor or forced/forced labor.

The information requested is closely linked to the verification of the aspects envisaged by the professional and psycho-aptitude profile.

The Human Resources Function, within the limits of the information available, adopts appropriate measures to avoid discrimination, favouritism, nepotism, or forms of clientelism in the selection and recruitment phases by choosing, appointing, remunerating and organising human resources on the basis of criteria of merit, competence, objectivity and reasonableness. All this while respecting the candidate's private sphere and opinions, without any discrimination of religion, gender difference,

ethnicity, nationality, political or trade union beliefs and favoring, compatibly with the general efficiency of work, that flexibility in the organization of work that facilitates the management of maternity and childcare in general.

The Company, with regard to its employees/collaborators, avoids any form of discrimination against its collaborators, slavery or servitude or continuous subjection also pursuant to Article 600 of the Criminal Code. In addition, the body contrasts the phenomena, even veiled and indirect, that may lead to the acceptance of principles related to racial hatred, xenophobia or aiding and abetting illegal immigration in full compliance with the contents of Laws 161/2017 and 167/2017.

3.3.1. Dissemination of personnel policies

Personnel management policies are made available to all employees/collaborators through the normal company information and dissemination tools typically used (Internal Regulations, Internet, company website, organizational documents and communications of managers).

3.3.2. Enhancement and training of resources

The managers make full use of and enhance all the professionalism present in the Company in order to improve and increase the assets and competitiveness of the skills possessed by each employee/collaborator in the organizational context through the activation of the available levers to promote the development and growth of their collaborators.

To this end, it considers the criterion of merit, professional competence, honesty and correctness of behavior as privileged foundations for the adoption of any decision concerning the career and any other aspect relating to the employee.

In this context, it is particularly important for managers to communicate the strengths and weaknesses of the employee/collaborator, so that the latter can tend to improve their skills also through targeted training. Therefore, at least once a year, an evaluation of the performance of all employees is carried out, identifying and sharing achievable objectives. The evaluation of collaborators is carried out in a broad manner involving the managers, the Human Resources Function and, as far as possible, the subjects who have entered into a relationship with the person being evaluated.

The Company provides all employees with information and training tools, both residential and remote, with the aim of enhancing the specific skills and preserving the professional value of the staff. Training is assigned to groups or individual collaborators in accordance with specific professional development needs; moreover, with regard to distance learning (delivered through the Internet, intranet or CD), which is not directly assigned, each employee/collaborator can use it on the basis of their interests outside normal working hours. Institutional training is provided at certain times in the employee's corporate life (for example, for new hires there is an introduction to the Company and its business) and recurring training aimed at operational staff.

Each manager is required to enhance the working time of employees/collaborators by requesting services consistent with the performance of their duties and with the work organization plans. In this regard, work shifts with part-time, flexible and teleworking hours are planned.

It constitutes abuse of the position of authority to request, as an act due to the hierarchical superior, performance, personal favors or any behavior that constitutes a violation of this Code of Ethics.

The involvement of employees/collaborators in the performance of the work is ensured, also by providing moments of participation in discussions and decisions functional to the achievement of company objectives. The employee/collaborator must participate in these moments with a spirit of collaboration and independence of judgment. Listening to the various points of view, compatibly with the company's needs, allows managers to formulate final decisions; the employee/collaborator must, however, always contribute to the implementation of the established activities.

3.4. ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP

Staff are hired under a regular employment contract; no form of *"irregular work"* is tolerated including, but not limited to:

1. the employment of third-country nationals whose stay is irregular in compliance with art. 25-duodecies of Legislative Decree 231/01 with reference to Legislative Decree 109/2012 et seq.;
2. the exploitation of the worker's state of need or necessity using violence, threats or intimidation, the supply of work for pseudo-contracting, the unlawful posting of workers or the administration of abusive work in compliance with art. 25-quinquies of Legislative Decree 231/01 with reference to Law 199/2016;
3. by the hiring of underage workers.

Upon establishment of the employment relationship, each employee/collaborator receives accurate information regarding:

- characteristics of the function and tasks to be performed;
- regulatory and remuneration elements, as regulated by the National Collective Bargaining Agreement;
- rules and procedures to be adopted in order to avoid possible health risks associated with work.

This information is presented to the employee/collaborator in such a way that the acceptance of the assignment is based on an effective understanding.

The provisions set out in this Code of Ethics are part of the contractual obligations of all the Company's employees.

3.5. INTERVENTIONS ON THE ORGANIZATION OF WORK

In the case of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and/or professional retraining actions.

The costs of the reorganization of work must be distributed as evenly as possible among all employees/collaborators, consistent with the effective and efficient exercise of business activity.

In the event of new or unforeseen events, which must in any case be made explicit, the employee/collaborator may be assigned to tasks other than those carried out previously, taking care

to safeguard his or her professional skills. This also includes particular periods experienced by the company due to company or sector crisis, carrying out extraordinary transactions, etc.

The entity, in any case, implements all the necessary behaviors and decisions so that phenomena of fictitious posting of a worker do not occur with the risk of committing the so-called crime of *"unlawful posting"*.

3.6. SAFETY, HYGIENE AND HEALTH AT WORK

All decisions on health and safety at work must be based on compliance with the law and Article 25-septies of Legislative Decree 231/01, in particular the provisions contained in Legislative Decree No. 81/08 and subsequent amendments and/or additions.

The Company undertakes to ensure its employees and collaborators work environments suitable for safeguarding their health, safety and physical and moral integrity, also through activities to prevent occupational risks (e.g. homicide or serious or very serious culpable injuries) and information and training, in accordance with current legislation and the ethical and organisational procedures/protocols adopted by the Company, which must be strictly respected.

The Company undertakes to spread and consolidate a culture of safety by developing awareness of risks, promoting responsible behaviour on the part of all employees/collaborators who, within the scope of their duties and functions, participate in the process of risk prevention, environmental protection and protection of hygiene, health and safety at work towards themselves, colleagues and third parties in general; in fact, it works to protect, especially with preventive actions, the health and safety of workers as well as the interest of other stakeholders (European Directive 89/391 art. 6).

The Company's objective is to protect human, equity and financial resources, constantly seeking the necessary synergies not only internally but also with suppliers, companies and customers involved in the Company's activities.

Intexo SB S.r.l. a socio unico, attentive to the evolution of the reference scenarios and the consequent change in threats, carries out interventions of a technical and organizational nature, through:

1. monitoring of the risk and safety management system;
2. a continuous analysis of the risk and criticality of the processes and resources to be protected;
3. the adoption of hygiene measures and health control of workers according to specific risks and emergency measures to be implemented in the event of first aid, firefighting, evacuation of workers and serious and immediate danger;
4. the adoption of the best technologies and periodic maintenance of environments and equipment;
5. the control and updating of working methods;
6. the contribution of training and communication interventions;
7. the continuous improvement of the efficiency of company structures and processes that contribute to the continuity of the services provided.

3.6.1. Alcohol or drug abuse and smoking

Intexo SB S.r.l. a socio unico requires that all recipients of this Code personally contribute to maintaining the work environment that respects the sensitivity of others.

The Company is absolutely prohibited from:

1. present themselves at the workplace and carry out their work activities in a psychophysical state altered by the use of alcohol, drugs or substances with a similar effect;
2. consume or sell drugs for any reason during the course of work;
3. smoking in the workplace and, in any case, wherever smoking may pose a danger to company structures and assets or to the health or safety of colleagues, users and third parties.

The Company undertakes to promote the social actions provided for in this regard by current legislation.

3.7. PRIVACY POLICY

The activities provided by the Company require the acquisition, storage, processing, communication and dissemination, including through computer or telematic systems, of news, documents and other data relating to negotiations, administrative procedures, financial transactions, know-how (contracts, deeds, reports, notes, studies, etc.).

The Company's databases may contain, also on computer and telematic supports, data:

- personal data protected by the legislation protecting privacy;
- that due to negotiated agreements cannot be made known to the outside world;
- the disclosure of which could cause harm to the company's interests.

All activities related to the processing, including through IT and telematic systems, of personal or confidential data must be managed in strict compliance with the regulatory provisions in force pursuant to European Regulation 2016/679. For this reason, the Company undertakes to protect the privacy of its employees, collaborators, suppliers generated or acquired within and in business relationships, adopting standards that specify the information that the company requests from them and the related methods of processing and cancellation and/or storage.

Any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees/collaborators is excluded. These standards also prohibit the communication/dissemination of personal data without the required consent of the data subject and establish the rules for the control, by each employee/collaborator, of the rules to protect privacy.

Conversely, the employee/collaborator is also responsible for the protection of sensitive data of which he or she becomes aware through his or her activity.

For this reason, the employee/collaborator is required to:

1. acquire and process only the data necessary and appropriate for the performance of its functions;
2. acquire and process the data only within specific procedures;

3. ensure that sensitive information and data are properly stored in password-protected files and keyed cabinets so that unauthorised persons are prevented from taking cognizance;
4. disclose information only if strictly necessary, within the framework of pre-established procedures and/or with the explicit authorization of higher positions and/or competent functions and in any case, in any case, after having ensured that the data will be disclosed in the specific case;
5. ensure that there are no absolute or disclosure obligations regarding third parties connected to the Company by a relationship of any nature and, where appropriate, obtain their consent;
6. associate the data in such a way that any person authorised to have access to them can easily draw the most precise, exhaustive and truthful picture possible;
7. exercise caution when using hands-free phones or mobile phones;
8. carefully store sensitive information and data within your personal laptop while traveling;
9. not to discuss sensitive issues in public;
10. ensure that personal data is kept for as long as necessary for the purposes for which it was processed;
11. ensure that the persons whose sensitive information is collected have been informed in advance and duly informed;
12. ensure that such sensitive information is used fairly and for particular and transparent purposes.

It is good to keep in mind that once sensitive information and/or data has been disseminated, it is very complicated to remedy such misuse.

The information, knowledge and data acquired or processed by the recipients of this Code during their work or through their duties belong to the Company and may not be used, communicated or disclosed without specific authorisation from the Superior or the competent function.

Furthermore, it should be noted that even after the termination of the employment relationship with the Company, the employee/collaborator and any other representative are required to maintain the confidentiality of the information known to them.

For any doubts and/or uncertainties of operational behaviour, each collaborator is required to contact, without delay, his or her direct Superior, who will be responsible for involving, for any specific problem, the Data Processing Manager and/or the System Administrator.

3.8. INTEGRITY AND PROTECTION OF THE PERSON

The Company is committed to protecting the moral integrity of employees/collaborators by guaranteeing the right to working conditions that respect the dignity of the person. For this reason, it protects workers from acts of psychological violence and counteracts any discriminatory attitude or behavior or behavior that is harmful to the person, his beliefs and preferences (for example, in the case of insults, threats, isolation or excessive intrusiveness, professional limitations, obstruction to better job prospects, unjustified interference with the performance of the work of others) as well as to ensure that an environment of intimidating and uncomfortable work.

This specific area includes the adoption of practices and procedures that prevent risks, and where present by promptly identifying them and removing their causes, deriving from the stressful phenomena of:

- mobbing, understood as *"the conduct of the employer or hierarchical superior, systematic and protracted over time, held towards the worker in the work environment, which results in systematic and repeated hostile behaviour that ends up taking forms of prevarication or psychological persecution, which can result in moral mortification and marginalisation of the employee, with a detrimental effect on his physiopsychic balance and the complex of his personality"* (ex plurimis, Cass. n° 22393/2012);
- straining, understood as an *"attenuated form of mobbing in which the character of the continuity of vexatious actions is not found"* (Cass. civ. sez. Lavoro, ord. 3977, 19.02.2018);
- bullying, targeting certain workers through intimidation, harassment or ill-treatment;
- bossing, aimed at certain workers through the exploitation of the hierarchical position by the Function Manager;
- work stalking, aimed at certain workers through wear and tear of the task, depletion of the professional level or aggressive conduct of the Function Manager.

This is in order to avoid the potential and abstract violation of the rules for the prevention of work-related stress falling within the provisions for the protection of the health and integrity of the worker.

The Company does not admit and prevents, as far as possible, and in any case persecutes mobbing, straining, bullying, bossing, work stalking, sexual and personal harassment of any kind. Therefore, behaviors or speeches that may disturb the person's sensitivity must be avoided.

The Company, for itself as an entity and for the natural persons capable of committing its will, guarantees not to allow the development of criminal activities aimed at facilitating the commission of the crimes referred to in Article 25-quinquies (crimes against the individual personality) as well as those contemplated by Article 24-ter of Legislative Decree 231/01 (crimes of organized crime) referred to in the Lanzarote Convention of the Council of Europe for the protection of minors against sexual exploitation and sexual abuse.

The employee/collaborator of Intexo SB S.r.l. a socio unico who believes that he or she has been harassed or discriminated against for reasons related to age, gender difference, race, state of health, nationality, political, trade union and personal opinions, religious beliefs, economic conditions, etc., may report the incident to the Supervisory Body, which will assess the actual violation of the Code of Ethics. However, inequalities are not considered discrimination if they are justified or justifiable on the basis of objective criteria.

The Company does not carry out actions or pressures on human resources in such a way that they, for the interest or advantage of the same, are induced not to make statements or to make false or misleading statements to the judicial authorities (Article 377 of the Criminal Code).

3.9. DUTIES OF EMPLOYEES AND COLLABORATORS

All employees and collaborators are required to carry out their activities, based on courtesy and transparency, with a sense of responsibility, absolute diligence and a collaborative spirit towards colleagues and third parties.

They must act loyally in order to comply with the obligations signed in the employment contract and the provisions of the Code of Ethics.

3.9.1. Conflict of interest

All employees/collaborators of Intexo SB S.r.l. a socio unico are required to avoid situations in which conflicts of interest may arise and to refrain from personally taking advantage of business opportunities of which they have become aware in the course of carrying out their duties.

It is forbidden to use the name and image of the Company for personal purposes and interests.

Directors, employees and collaborators who find themselves in a situation of conflict of interest, even if only potential, must immediately inform the Chairman of the Board of Directors who will assess the conduct to be adopted.

By way of example but not limited to, the following situations may lead to conflicts of interest:

1. perform a top management function and have economic interests with suppliers, customers or competitors (ownership of shares, professional shares, etc.) also through family members;
2. take care of relations with suppliers and carry out work, even by a family member, with suppliers;
3. accept money or favors from people or companies that are or intend to enter into business relationships with Intexo SB S.r.l. a socio unico;
4. be a former public employee, or member of the top political bodies of the Public Administrations, who in the previous three years of service has exercised authorization or negotiation powers on behalf of the Public Administrations having as its addressee the same Intexo SB (so-called prohibition of pantouflage or revolving doors).

In the event that even the appearance of a conflict of interest occurs, the employee/collaborator is required to notify his/her manager who, in accordance with the procedures provided, informs the Chairman who assesses his/her actual presence on a case-by-case basis. In the event that his or her direct superior is involved in the report, the collaborator is required to inform the Supervisory Body.

The collaborator is also required to provide information about the activities carried out outside working hours, in the event that these may appear to be in conflict of interest with the Company itself.

3.9.2. Use of company assets

Each employee/collaborator is required to work diligently to protect company assets, through responsible conduct and in line with the operating procedures set up to regulate their use, accurately documenting their use. In particular, each employee must:

1. use the assets entrusted to him scrupulously and sparingly;

2. avoid improper use of company assets that may cause damage or reduce efficiency, or in any case contrary to the interest of the Company;
3. promptly inform their direct superior of any threats or events harmful to the Company.

Intexo SB S.r.l. a socio unico reserves the right to prevent distorted use of its assets and infrastructures through the use of accounting systems, financial control reporting and risk analysis and prevention, without prejudice to compliance with the provisions of the laws in force on the subject.

In addition, the entity prohibits employees and collaborators, within any perimeter in which the Company operates, from any demonstration that may even indirectly instigate the acceptance of racist or xenophobic ideologies.

3.9.3. Use of IT tools

The use of IT tools, and in particular of the related e-mail and Internet access services, must be inspired by the canons of correctness and loyalty on which this Code is based and be compliant, in addition to the legislation widespread within the Company, with the criminal laws that sanction the so-called *"Criminal Regulations". "computer crimes and unlawful processing of data"* referred to in art. 24-bis of Legislative Decree 231/01.

The transmission of data and information by computer and telematic means to public entities or in any case relating to documents having probative value, takes place according to criteria of legitimacy, truth, exact correspondence to the facts and circumstances represented. In particular, it is forbidden for all recipients of this Code to falsify a public electronic document or document having probative value.

Abusive access to a computer or telematic system, or the possession and abusive dissemination of access codes to computer or telematic systems, as well as the dissemination of equipment, devices or computer programs, aimed at intercepting, damaging, preventing or interrupting an IT or telematic system or related communications, is also prohibited.

Finally, each employee/collaborator is required to:

1. not to use, consult or disseminate audiovisual material online that may make explicit reference to hypotheses of xenophobia and racism;
2. not to send threatening or abusive e-mail messages, not to resort to low-level language, not to express inappropriate comments that may offend the person and/or damage the corporate image;
3. not to browse websites with indecorous and offensive content and in any case not related to professional activities;
4. not interact, especially and not only during working hours, with the so-called *"social technologies"* (*social networks*, *social commerce*, *blogs/microblogs*, *social gaming*, *wikis*, media and file *sharing*, chats and forums, etc.) without the prior authorization of the Head of the Human Resources Function for work reasons (e.g. company marketing) and with reference to a possible distraction of the same from their duties both with reference to the damage to the image of the company or *Corporate Reputation*;

5. not to possess material that does not comply with copyright law (SIAE) and child pornography, including virtual pornography, as it constitutes a crime pursuant to art. 25-quinquies of Legislative Decree 231/01;
6. Use of the personal computer must be used exclusively for work purposes.

Furthermore, the recipients of this Code are strictly prohibited from any conduct aimed at the unlawful interception, impediment or interruption of computer or telematic communications; or the installation of equipment designed to intercept, prevent or interrupt computer or telematic communications.

Conduct that damages information, data and computer programs is prohibited; damage to information, data and computer programs used by the State or by another public body or in any case of public utility.

SECTION III
CRITERIA OF CONDUCT IN CUSTOMER RELATIONS

3.10. IMPARTIALITY

Intexo SB S.r.l. a socio unico undertakes not to arbitrarily discriminate against its customers.

3.11. CONTRACTS AND COMMUNICATIONS TO CUSTOMERS

Contracts and communications to the Company's clients must be:

1. clear and simple, formulated with a language as close as possible to that normally used by the interlocutors;
2. compliant with current regulations, without resorting to elusive or otherwise incorrect practices;
3. complete, so as not to neglect any relevant element for the customer's decision.

3.12. EMPLOYEE BEHAVIOR STYLE

The style of behavior of Intexo SB S.r.l. a socio unico towards customers is based on availability, respect and courtesy with a view to a collaborative and highly professional relationship.

3.13. QUALITY CONTROL AND CUSTOMER SATISFACTION

The Company undertakes to guarantee adequate quality standards of the services offered in accordance with predefined levels and to periodically monitor the perceived quality.

SECTION IV
CRITERIA OF CONDUCT IN RELATIONS WITH SUPPLIERS

3.14. CHOICE OF SUPPLIER

The purchasing processes are based on the search for the maximum competitive advantage for Intexo SB S.r.l. a socio unico to the granting of equal opportunities for suppliers, loyalty and impartiality.

The Company uses suppliers who operate in compliance with current legislation. The selection of suppliers and the determination of purchase conditions must be based on an objective assessment not only of the quality, the price of the goods and services offered, the ability to promptly supply and guarantee goods and services of a level appropriate to the needs of the Company but also for ethical-deontological aspects. Under no circumstances shall a supplier be preferred to another by reason of personal relationships, favouritism or other advantages, other than those of the exclusive interest and benefit of the Company.

All relationships established with suppliers must be governed by written agreements before the start of the collaboration, also in compliance with the Ethical and Organisational Protocol *"Management of contracts and letters of appointment";* contractors and subcontractors are required to comply with the provisions of this Code as well as with the various reference regulations, including the rules relating to the so-called *"Joint and several tax liability"* pursuant to Legislative Decree 83/2012 et seq.

In particular, the Company's employees/collaborators involved in these processes are required to:

1. not preclude anyone in possession of the required requirements from competing in the stipulation of contracts, adopting objective and documentable criteria in the choice of the shortlist of candidates;
2. ensure sufficient and transparent competition in each tender, for example by considering at least three companies in the selection of the supplier; Any exceptions must be authorized and documented.

For some product categories, the Company has a Supplier Register whose qualification criteria do not constitute an access barrier.

For Intexo SB S.r.l. a socio unico The following reference requirements are:

1. the score obtained by the supplier for the Legality Rating;
2. the adoption and constant updating of the Organisational, Management and Control Model of Legislative Decree 231/01 and related regulations by the supplier;
3. if obliged recipients, registration on the white list;
4. the possible voluntary adherence to the Legality Protocol signed between Confindustria and the Ministry of the Interior on 10 May 2010 and subsequently supplemented;
5. the social and environmental impact (the assessment of the supplier is based on negative characteristics such as the adoption of child labour or on the basis of criteria that enhance its reputation through, for example, the adoption of exemplary labour practices);
6. the appropriately documented availability of means, including financial means, organisational structures, project skills and resources, know-how, etc.;
7. the existence and effective implementation, in cases where the Company's specifications provide for it, of adequate company quality systems (e.g. ISO Certifications);

8. where the supply includes know-how or rights of third parties, the obtaining of a significant share of added value by the suppliers;
9. the adoption of ethical business practices, data protection, confidentiality and above all the fight against the use of acts of corruption and/or bribery.

Payments can never be settled in cash for which there is an obligation to comply with the contents of art. 25-octies of Legislative Decree no. *"Receiving stolen goods, money laundering, use of money, goods or utilities of illegal origin as well as self-laundering"*.

3.15. INTEGRITY AND INDEPENDENCE IN RELATIONSHIPS

Relations with suppliers, including financial and consultancy contracts, are governed by principles common to the economic sector to which they belong and are subject to constant and careful monitoring by the Company itself.

The stipulation of a contract with a supplier must always be based on extremely clear relationships, avoiding, where possible, forms of dependence.

Thus, by way of example and not exhaustively:

1. any contract whose estimated amount is greater than 50% of the supplier's turnover must be communicated to top management;
2. As a rule, long-term binding projects with short-term contracts that require continuous renewals with price revisions, or consultancy contracts without adequate transfer of know-how, etc., are avoided.
3. it is forbidden to induce a supplier to enter into a contract that is unfavourable to him by suggesting a subsequent more advantageous contract.

To ensure maximum transparency and efficiency of the purchasing processes, the Company prepares:

- adequate reconstructability and traceability of the choices made;
- the storage of information as well as official tender and contractual documents for the periods established by the regulations in force and referred to in the internal purchasing procedures.

The persons in charge of the acquisition process are required to immediately report to the Chairman of the Board of Directors any attempt or case of unjustified alteration of normal business relations.

3.16. PROTECTION OF ETHICAL ASPECTS IN SUPPLIES

With a view to confirming the procurement activity in accordance with the ethical principles adopted, the Company undertakes to introduce ethical and social requirements for particular supplies.

Violations of the general principles of the Code of Ethics involve the application of sanctioning measures also aimed at avoiding crimes against the Public Administration or corruption between private individuals. To this end, specific clauses are provided for in the individual contracts.

In particular, any contracts with suppliers from *"at risk" countries,* defined as such by recognized organizations, include contractual clauses that provide:

1. a self-certification by the supplier of adherence to specific social obligations (for example, measures that guarantee workers respect for fundamental rights, the principles of equal treatment and non-discrimination, the protection of child labour, the periodic acquisition of regular residence permits for non-EU employees);
2. the possibility of making use of control actions at the production units or operational offices of the supplier company, in order to verify compliance with these requirements.

SECTION V
CRITERIA OF CONDUCT IN RELATIONS WITH THE COMMUNITY

3.17. ECONOMIC RELATIONS WITH PARTIES, TRADE UNIONS AND ASSOCIATIONS

3.17.1. Political parties

Intexo SB S.r.l. a socio unico does not finance parties both in Italy and abroad, their representatives or candidates, nor does it sponsor congresses or parties that have an exclusive purpose of political propaganda. It refrains from any direct or indirect pressure on politicians (e.g., acceptance of recruitment recommendations, consulting contracts).

3.17.2. Trade unions

The Company does not make contributions of any kind, directly or indirectly, to trade unions, nor to their representatives or candidates except in the forms and ways provided for by current regulations. Relations with the Trade Unions are based on principles of fairness and collaboration in the interest of the Company, employees and the community.

However, it is possible to cooperate, including financially, with these organisations for specific projects provided that there is a:

- clear and documented allocation of resources;
- express authorization by the functions in charge within Intexo SB S.r.l. a socio unico

3.17.3. Associations

It is strictly forbidden to participate in or subsidize in any form subversive associations or with terrorist or subversive purposes.

3.18. RULES OF CONDUCT IN RELATIONS WITH SUPERVISORY AND CONTROL ENTITIES

The Company, in all its articulations, bases its relations with the subjects responsible for supervision and control to maximum collaboration in full respect of their role, their autonomy and their power of initiative, committing itself to promptly implement their prescriptions.

The Company undertakes to provide, even if necessary in advance, all the information requested by the persons responsible for the supervision and control of the services provided, in a complete,

correct, adequate and timely manner.

To this end, the Company prepares and implements the appropriate and appropriate organisational procedures to identify the persons competent to coordinate with the supervisory and control bodies as well as to provide for the collection, processing and transmission of the information requested by such subjects.

3.19. CONTRIBUTIONS AND SPONSORSHIPS

The company can adhere to requests for contributions limited to proposals from organizations and associations that are openly non-profit and with regular statutes and articles of association, which are of high cultural or charitable value or, in any case, which involve a considerable number of citizens.

Sponsorship activities, which may concern social, environmental, sport, entertainment and art issues, are intended only for events that offer guarantees of quality or for which Intexo SB S.r.l. a socio unico can collaborate in the design in order to guarantee originality and effectiveness.

In any case, in choosing the proposals to join, the Company pays particular attention to any possible conflict of interest of a personal or corporate nature (for example, family relationships with the interested parties or links with bodies that may, due to the tasks they perform, in some way favor the activity of the entity).

To ensure the consistency of contributions and sponsorships, their management is regulated by a special procedure, which contains an explicit prohibition of corruption between private individuals.

3.20. RULES OF CONDUCT IN RELATION TO NATIONAL AND INTERNATIONAL ACTIVITIES

All recipients of the Code of Ethics are required not to:

1. facilitate in any way criminal or mafia-type associations, or aimed at tobacco smuggling, or drug trafficking;
2. promote the procured illegal entry or encourage illegal immigration pursuant to Article 25-duodecies of Legislative Decree 231/01;
3. engage in conduct of personal aiding and abetting or that induces not to make statements or to make false statements before the judicial authority or in any case aimed at altering its functioning.

4. Implementation methods

4.1. INTERNAL CONTROLS

The recipients of this Code of Ethics must be aware that an Organisation, Management and Control Model has been adopted consisting of multiple, specific and codified Protocols, systematically and constantly updated, in order to ensure compliance with current legislation and full effectiveness, and aware of the contribution and relevance that this organisational, management and control Model

ensures to the achievement of strategic and corporate objectives. operational and efficiency.

" *Internal controls"* means *all the tools necessary or useful to direct, manage and verify the activities of the structure in all its articulations with the primary objective of ensuring compliance with regional laws and measures, protecting company assets, providing sufficient health activities and providing accurate and complete accounting and financial data.*

In this context, in the light of the relevant legislation in force, this Organisational Model, which is constantly updated, also guarantees the Company from the risk of incurring *"administrative liability for crime"* and the consequent sanctions, pursuant to and for the purposes of Legislative Decree 231/01 and related regulations.

The responsibility for creating effective internal control is common to every operational level. Consequently, all recipients of this Code, within the scope of the functions performed, are responsible for the definition, implementation and correct functioning of the controls inherent in the operational areas entrusted to them. Within the scope of their responsibilities, the Function Managers are required to participate in the Company Control System and to involve their collaborators. Every operation and transaction must be correctly recorded, authorized, verifiable, legitimate, consistent and congruous.

4.2. RECORDING OF OPERATIONS

All operations of Intexo SB S.r.l. a socio unico must have an adequate registration in order to ensure effective and concrete traceability of the same and it must be possible to verify the decision-making, authorization and performance process.

For each operation there must be adequate documentary support in order to be able to proceed, at any time, to carry out checks that certify the characteristics and reasons for the operation and identify who authorised, carried out, registered and verified the operation itself.

4.3. REPORTS OR OBLIGATION TO REPORT TO THE COMPANY'S ADMINISTRATION AND/OR THE SUPERVISORY BODY

All recipients of the Code are required to promptly report to the Supervisory Body and/or the Company's Administration any conduct contrary to the provisions of the Code itself, the Organisational Model for the prevention of crimes, national and regional laws and internal ethical and organisational procedures/protocols.

The Company has made every effort to activate dedicated communication channels and Whistleblowers can report, in accordance with the procedures illustrated in the Ethical and Organisational Protocol entitled *"Management of complaints (Whistleblowing System Guidelines)",* any violation or suspected violation of the Company's Model 231.This is in accordance with the contents of Legislative Decree no. 24 of 10 March 2023 on the *"Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and laying down provisions concerning the protection of persons who report breaches of national regulatory provisions".*

Any report that is unfounded, false, non-existent and made, with intent or gross negligence, in order

to cause harm to colleagues and/or collaborators will be considered an infringement and disciplined in compliance with the contents of the Ethical and Organizational Protocol *"Disciplinary system and sanctioning mechanisms"*. This is in order to repress a distorted use of the tool.

Whistleblowers will be protected against any act that may give rise to even the slightest suspicion of being a form of retaliation, discrimination or penalization; the confidentiality of the identity of the whistleblower will also be guaranteed, without prejudice to legal obligations and the protection of the rights of the Company or of persons wrongly and/or in bad faith as indicated, as mentioned, from the contents of the Organisational Ethics Protocol no. 15/2008 *"Management of complaints (Whistleblowing System Guidelines)"*.

5. Sanctioning provisions

5.1. SUPERVISORY BODY

Intexo SB S.r.l. a socio unico has set up internally, pursuant to Legislative Decree 231/01 and related regulations, a single-subject Supervisory Body, characterized by the requirements of autonomy and independence and consequently endowed with autonomous and effective powers of initiative, inspection and control and with reference to which a specific Regulation has been drawn up and adopted, periodically updated in order to ensure its up-to-dateness, efficiency and operational effectiveness.

The Supervisory Body *pursuant to* Legislative Decree 231/01, among its many control functions:

1. monitors compliance with the Code of Ethics and recommends compliance with the Organisation, Management and Control Model of Legislative Decree 231/01 et seq., promptly reporting any violations of the same to the Board of Directors;
2. verifies, through the Human Resources Department, the maximum dissemination of the Code of Ethics and recommends the dissemination of the contents of the Organisation, Management and Control Model of Legislative Decree 231/01 et seq. through an adequate information and awareness-raising plan aimed at promoting knowledge of the principles and rules contained therein;
3. suggests the constant updating of the Code of Ethics and the Organisation, Management and Control Model of Legislative Decree 231/01 et seq. in relation to its concrete effectiveness and changes in corporate needs and current legislation;
4. carries out checks, including preventive checks, on any notice of violation of the rules of the Code of Ethics and the Organisation, Management and Control Model of Legislative Decree 231/01 et seq., assessing the facts and taking, in the event of ascertained violation, appropriate sanctions;
5. ensures that there are no retaliations of any kind deriving from having provided information of possible violations of the Code of Ethics and the Organization, Management and Control Model of Legislative Decree 231/01 et seq.

The information and reports acquired by the Supervisory Body and the structures used by it are considered confidential and may not be disclosed except in the cases provided for by current

legislation.

5.2. COMMUNICATION AND TRAINING

The Code of Ethics drawn up pursuant to Legislative Decree 231/01 et seq. is brought to the attention of internal and external stakeholders through specific communication activities.

The provisions of this Code are also brought to the attention of the persons concerned by delivery and posting on the company bulletin board or in a place accessible to all.

The Company undertakes to make this Code known to all persons, directly or indirectly, who are directly or indirectly concerned.

In order to ensure the correct understanding of the Code of Ethics for all interested parties, the Company undertakes to organize, also on the basis of the indications of the Supervisory Body, training internships or Distance Learning courses (FAD) aimed at promoting knowledge of ethical standards. Participation in the Training Plans is mandatory.

Training initiatives are differentiated according to the role and responsibility of employees; for new hires, a special training course is provided that illustrates the contents of the Code of Ethics whose compliance is required.

5.3. CONSEQUENCES OF VIOLATING THE CODE OF ETHICS

The legislation provides that the violation of the Code of Ethics is considered a violation of contractual obligations pursuant to Article 2104 of the Italian Civil Code. This regulatory provision regulates that: *"[...] the worker must use the diligence required by the nature of the service due, by the interest of the company and by the superior interest of national production; he must also observe the provisions for the execution and discipline of work given by the entrepreneur and his collaborators on whom he hierarchically depends".*

It was also noted that the violation of the Code of Ethics constitutes a breach of the regulations relating to the employment relationship pursuant to all art. 7 of the Workers' Statute.

The recipients of this Code of Conduct are also sanctioned by the entity in accordance with the provisions of the Organisational Ethics Protocol no. 6/2008 and subsequent amendments *"Disciplinary system and sanctioning mechanisms",* to which reference is made for due details and an integral part of the Organisational, Management and Control Model Legislative Decree 231/01 and related regulations, which contains the procedure and the related sanctions.

The competent corporate functions, activated by the Chairman of the Board of Directors, define the measures, referred to in the Disciplinary System of Model 231, take care of their implementation and report on the outcome. It should be noted that this Code of Ethics is also expressly valid towards third parties, in the sense that compliance with it is expressly required.

The Company encourages all recipients of the Code to provide any suggestions and/or additions to the Code that they deem useful to increase its operation and effectiveness. To this end, the Company has activated a means of communication and information through the e-mail address specified below:

odv@intexo.it.

6. Update of the Code of Ethics

The updating and correct application of the Code of Ethics is the responsibility of the Board of Directors, which will adapt it with reference to:

1. regulatory evolution;
2. changes in the Company's organisational structure;
3. to the corporate sensitivity on ongoing issues.